

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

PHILADELPHIA INDEMNITY INSURANCE *
COMPANY, *et al.* *

Plaintiffs

v.

* Civil Action No.: 05-CV-1005

PERMANENT SOLUTION INDUSTRIES, *
INC., *et al.* *

Defendants

* JUDGE LAMBERTH

* * * * *

**CONSENT MOTION FOR EXTENSION OF TIME
TO FILE DISCOVERY CONFERENCE REPORT**

All parties to the captioned case, by undersigned counsel, respectfully request an extension of time to file the parties' Discovery Conference Report under Federal Rule 16 and Local Rule 16.3, until September 30, 2005, for the reasons that follow:

1. The captioned case was filed in May of 2005, and served in June of 2005. There are four parties (two plaintiffs and two defendants) and four attorneys from four separate law firms have entered appearances for the parties.

2. The parties are attempting to schedule a conference to discuss a proposed discovery plan, ADR and other matters, in accordance with Local Rule 16.3 and Federal Rules 16 and 26. However, counsel have their summer vacations scheduled one after the other, with the result that one lawyer or another is out of town every day for more than one month.

3. All counsel will be back in the office beginning September 12, 2005. The parties respectfully request a short extension of time, until September 30, 2005, to file their Discovery Conference Report. This will allow counsel two weeks to meet and to prepare and file the report, after all counsel return from their vacations.

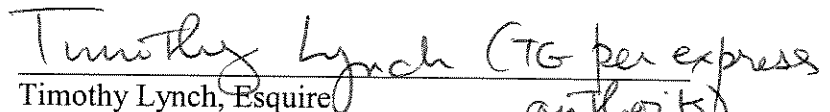
4. All parties consent to the granting of this Motion.

WHEREFORE, the parties respectfully request that the time for filing the parties' Discovery Conference Report be extended until September 30, 2005. A proposed Order is attached for the Courts' convenience.

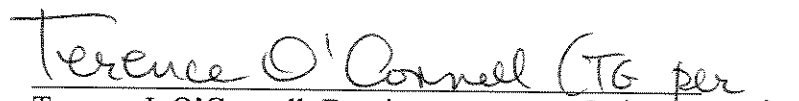
Respectfully submitted,



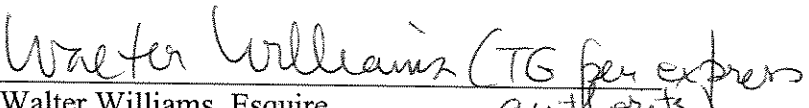
Shirlee Norris Lake, Esquire, Bar No.: 454327
Terri L. Goldberg, Esquire, Bar No.: MD09698
Eccleston & Wolf, P.C.
7th Floor, Scarlett Place
729 E. Pratt Street
Baltimore, Maryland 21202-4460
(410) 752-7474
*Attorneys for Plaintiff Philadelphia
Indemnity Insurance Co.*



Timothy Lynch, Esquire (TG per express
authority)
Offit, Kurman, Yumkas & Denick, P.A.
8 Park Center Court, Suite 200
Owings Mills, MD 21117
*Attorneys for Plaintiffs The Chimes
and The Chimes District of Columbia*



Terence J. O'Connell, Esquire (TG per
express
authority)
Nathalie Johnson-Noon, Esquire
O'Connell, O'Connell & Sarsfield
401 E. Jefferson Street, Suite 204
Rockville, MD 20850
*Attorneys for Defendant
Permanent Solution Industries, Inc.*


Walter Williams, Esquire
Wilson, Elser, Moskowitz, Edelman & Dicker, LLP
8444 Westpark Drive, Suite 510
McLean, Virginia 22102
*Attorneys for Defendant Siemens
Building Technologies, Inc.*

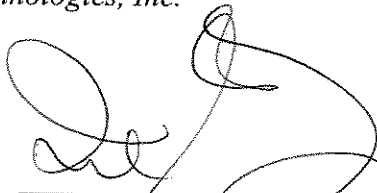
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of August, 2005, a copy of the foregoing
Consent Motion was served electronically to:

Timothy Lynch, Esquire
Offit, Kurman, Yumkas & Denick, P.A.
8 Park Center Court, Suite 200
Owings Mills, MD 21117
*Attorneys for Plaintiffs The Chimes
and The Chimes District of Columbia*

Terence J. O'Connell, Esquire
Nathalie Johnson-Noon, Esquire
O'Connell, O'Connell & Sarsfield
401 E. Jefferson Street, Suite 204
Rockville, MD 20850
*Attorneys for Defendant
Permanent Solution Industries, Inc.*

Walter Williams, Esquire
Wilson, Elser, Moskowitz, Edelman & Dicker, LLP
8444 Westpark Drive, Suite 510
McLean, Virginia 22102
*Attorneys for Defendant Siemens
Building Technologies, Inc.*


Terri L. Goldberg